

Message (Digitally Signed)

---

**From:** Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) [derek.j.robinson1@navy.mil]  
**Sent:** 11/3/2020 10:32:06 PM  
**To:** Sanchez, Yolanda [Sanchez.Yolanda@epa.gov]; McKinney, Kasheica (CII) [kasheica.mckinney@sfgov.org];  
juanita.bacey@dtsc.ca.gov  
**CC:** Franklin, William D CIV USN COMNAVFACENGCOM DC (USA) [william.d.franklin@navy.mil];  
juanita.bacey@dtsc.ca.gov; Reese, Shane@CDPH [shane.reese@cdph.ca.gov]; Praskins, Wayne  
[Praskins.Wayne@epa.gov]; Chesnutt, John [Chesnutt.John@epa.gov]; Wochnick, Heather M CIV USN (US)  
[heather.wochnick@navy.mil]  
**Subject:** RE: HPNS | Draft fact sheet "Parcel A is suitable for residential use" - Draft final for your review by November 4  
**Attachments:** EPA Draft\_ParcelAFactsheet\_MgtDraft\_v12 (002)\_Navy comments.docx; ATPFile\_CE6EEE48-3663-4393-AEBB-  
9A55F7C1723F.token; smime.p7s

Navy comments are embedded in the attached.

Thank you.

---

**From:** Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>  
**Sent:** Monday, November 02, 2020 9:50 AM  
**To:** Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>; McKinney, Kasheica (CII)  
<kasheica.mckinney@sfgov.org>; juanita.bacey@dtsc.ca.gov  
**Cc:** Franklin, William D CIV USN COMNAVFACENGCOM DC (USA) <william.d.franklin@navy.mil>;  
juanita.bacey@dtsc.ca.gov; Reese, Shane@CDPH <shane.reese@cdph.ca.gov>; Praskins, Wayne  
<Praskins.Wayne@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>  
**Subject:** [Non-DoD Source] RE: HPNS | Draft fact sheet "Parcel A is suitable for residential use" - Draft final for your  
review by November 4

Please disregard the last Word version and use this one. It's cleaner and should be more straight-forward.

Thank you,  
Yolanda

---

**From:** Sanchez, Yolanda  
**Sent:** Thursday, October 29, 2020 3:55 PM  
**To:** Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>; McKinney, Kasheica (CII)  
<kasheica.mckinney@sfgov.org>; juanita.bacey@dtsc.ca.gov  
**Cc:** Franklin, William D CIV USN COMNAVFACENGCOM DC (USA) <william.d.franklin@navy.mil>;  
juanita.bacey@dtsc.ca.gov; Reese, Shane@CDPH <Shane.Reese@cdph.ca.gov>; Praskins, Wayne  
<Praskins.Wayne@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>  
**Subject:** HPNS | Draft fact sheet "Parcel A is suitable for residential use" - Draft final for your review by November 4

Derek, Kasheica, and Nina,  
Thank you so much for your initial reviews of our draft Parcel A fact sheet. To be responsive to your comments and edits, we have made many changes to the language. We have also moved things around, to help with formatting and layout. (Thank you, Bill, for helping me find some great photos).

We recognize that in some parts of this fact sheet we are providing a summary of work done by the Navy (outside of CERCLA), CDPH, or the developers, which EPA did not have a role in. Therefore, we are looking for you to double-confirm the language (see comment bubbles), especially in places we have edited since your last review. In the attached Word document, I included only included *some* of the track changes from the last version.

I have also attached the map for your review and comment.

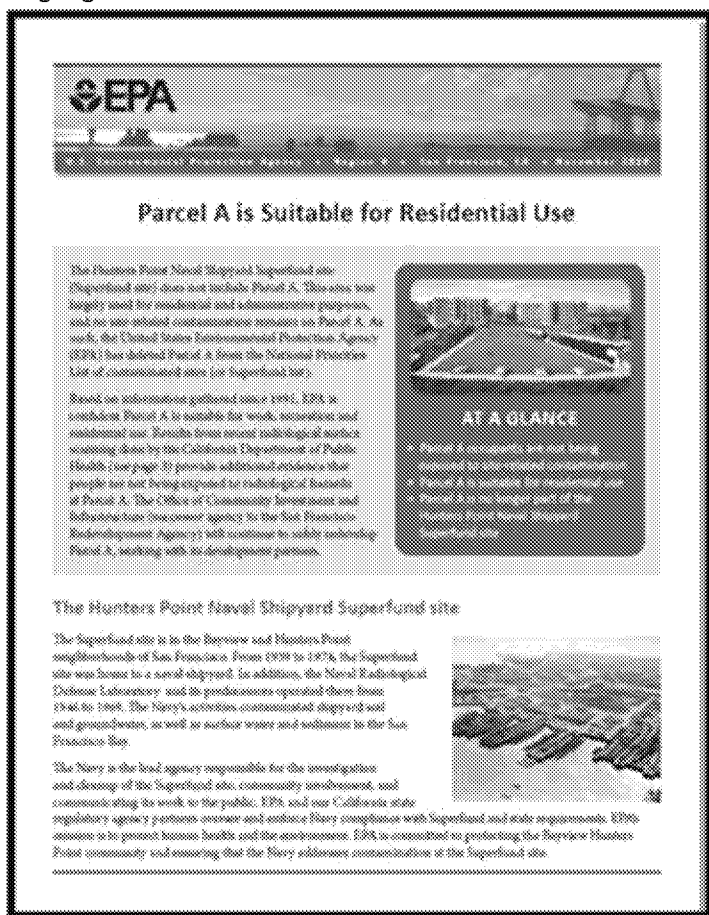
I hope you can find some time to review our draft fact sheet and provide any necessary edits in the next few days. **Is this a review that can be completed by COB November 4?** Please let me know if you have any questions or if that review timeframe doesn't work.

Thank you, in advance, for your time.

Yolanda Anita Sanchez, MS, MPA  
US Environmental Protection Agency  
Community Involvement for Superfund  
E-mail: [sanchez.yolanda@epa.gov](mailto:sanchez.yolanda@epa.gov) | | Desk: 415-972-3880

*Be safe. Stay in place. Maintain your space. Cover your face (when interacting).*

For look and feel, I included screen shots below. However, this is the OLD language, so please do not review this language.



The screenshot shows a document from the EPA with the title "Parcel A is Suitable for Residential Use". The document includes an EPA logo at the top left, a date "November 2007", and a header "U.S. Environmental Protection Agency". The main text states that the Hunters Point Naval Shipyard Superfund site does not include Parcel A, which was largely used for residential and administrative purposes. It mentions that the U.S. Environmental Protection Agency (EPA) has deleted Parcel A from the National Priorities List of contaminated sites. A section titled "AT A GLANCE" lists three bullet points: "Parcel A occupants are not being removed for the release of contamination", "Parcel A is suitable for residential use", and "Parcel A is no longer part of the Hunters Point Naval Shipyard Superfund site". The document also includes a section titled "The Hunters Point Naval Shipyard Superfund site" which describes the site's history and the Navy's role in the investigation and cleanup. The document is signed by the EPA and includes a disclaimer at the bottom.

**EPA**  
U.S. Environmental Protection Agency  
November 2007

### Parcel A is Suitable for Residential Use

The Hunters Point Naval Shipyard Superfund site (Superfund site) does not include Parcel A. This area was largely used for residential and administrative purposes, and no unrelated contamination remains on Parcel A. As such, the United States Environmental Protection Agency (EPA) has deleted Parcel A from the National Priorities List of contaminated sites (or Superfund sites).

Based on information gathered since 1991, EPA is confident Parcel A is suitable for work, recreation and residential use. Results from recent radiological surface sampling done by the California Department of Public Health (see page 3) provide additional evidence that people are not being exposed to radiological hazards at Parcel A. The Office of Community Remediation and Redevelopment (successor agency to the San Francisco Redevelopment Agency) will continue to actively redevelop Parcel A, working with its development partner.

#### AT A GLANCE

- Parcel A occupants are not being removed for the release of contamination
- Parcel A is suitable for residential use
- Parcel A is no longer part of the Hunters Point Naval Shipyard Superfund site

### The Hunters Point Naval Shipyard Superfund site

The Superfund site is in the Bayview and Hunters Point neighborhoods of San Francisco. From 1939 to 1976, the Superfund site was home to a naval shipyard. In addition, the Naval Radiological Defense Laboratory and its predecessors operated there from 1946 to 1968. The Navy's activities contaminated shipyard soil and groundwater, as well as surface water and sediment in the San Francisco Bay.

The Navy is the lead agency responsible for the investigation and cleanup of the Superfund site, community involvement, and communicating its work to the public. EPA and the California state regulatory agency partners oversee and enforce Navy compliance with Superfund and state requirements. EPA's mission is to protect human health and the environment. EPA is committed to protecting the Bayview Hunters Point community and ensuring that the Navy addresses contamination at the Superfund site.

## History of Parcel A

The Navy used Parcel A mostly for residences, administrative offices and an officers' club.

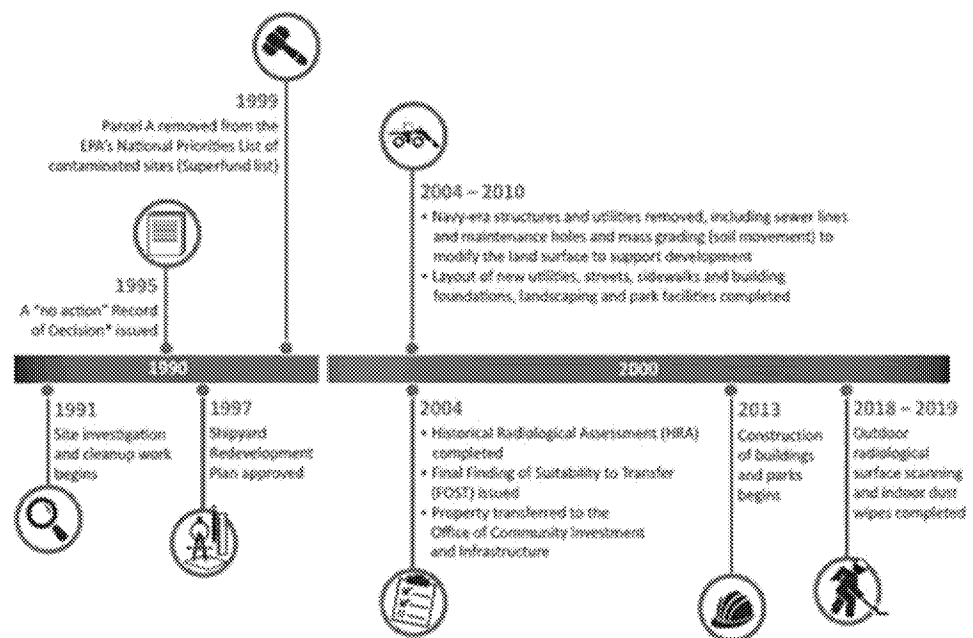
In the Navy's 2004 Historical Radiological Assessment (HRA) and other investigations, the Navy presents all available historical information regarding radiological activities. Preparing the HRA involved reviewing historical records, maps and photographs, reviewing previous work performed, and interviewing former Navy assigned workers.

At Parcel A, the only potential radiological sources the Navy identified in the HRA were Buildings 322, 416, and 621. Building 322 was identified for further investigation, because the Navy had relocated it from another area on the shipyard. Building 322 was later demolished and removed. Buildings 416 and 621 were identified for further investigation, because the National Radiological Defense Laboratory operated a high-voltage accelerator laboratory and a cry facility inside the buildings. The Navy investigated and cleared both buildings for unrestricted use.

In the early 1990s, the Navy performed routine cleanup activities at Parcel A to prepare the land for transfer. These include investigating and removing transducers, an aboveground waste tank, and a propane storage tank. In addition, the Navy removed sand blast grit used as backfill in a sewer line trench and removed soil from two areas that was contaminated with pesticides, petroleum, metals, and chemicals.

The Navy and EPA has determined there is no site-related contamination remaining at Parcel A. As such, EPA delisted Parcel A from the National Priorities List (or Superfund list). Before the Navy transferred the property, the Navy, EPA, and the state agreed the land was suitable residential use.

## Parcel A Redevelopment Timeline



\*A Record of Decision (ROD) is a legal decision document that records the way the lead agency will address contamination at the site. A "no action" ROD means no further cleanup is necessary to protect public health or the environment.

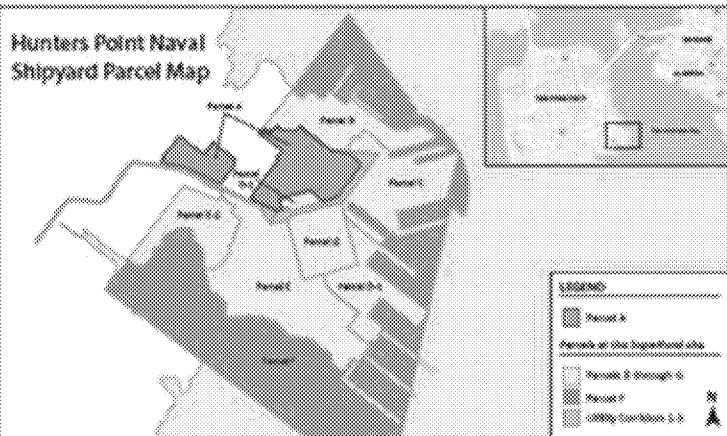
## History of Parcel A

Data reliability concerns regarding the Superfund site do not impact Parcel A.

Tetra Tech EC Inc., (TTEC) did not perform work on Parcel A. At Building 132 on Parcel A, Tetra Tech Foster Wheeler surveyed for radiological activity, then demolished and removed the building. EPA did radiological surface scanning by hand in the area where Building 132 was located, and we found no radiological contamination in the building footprint. Today, soils associated with the location of former Building 132 are under a layer of road bed and asphalt.

The redevelopment of Parcel A began in 2008.

The Navy transferred Parcel A to the Office of Community Development and Infrastructure in December 2004. Developers removed all Navy-era utilities, including sewer lines and maintenance holes. The developers also excavated (dig-out) and reused most of Parcel A's surface soil to prepare the land for redevelopment. They moved about 400,000 cubic yards (or 35,000 large dump truck loads) of soil from the hilltop area of Parcel A to level the land. All the excavated soil remains on Parcel A and has been used to fill in areas with lower elevations or stockpiled for future use. The developers put in new utilities, streets, sidewalks, building foundations and added additional soil for landscaping.



Today, the Superfund site includes six land parcels, labeled B through G and utility corridors (UCs) labeled UC1, UC2, and UC3. Again, the Superfund site does not include Parcel A.

## Navy's ongoing investigations and cleanup at the Hunters Point Naval Superfund site

Radiological data concerns from past work by Tetra Tech EC Inc. have been confirmed

To perform much of the past radiological cleanup work at the Superfund site, the Navy previously contracted with Tetra Tech EC Inc. (TTEC), a subsidiary of Tetra Tech Inc. In 2012, the Navy noticed irregularities in certain TTEC soil confirmation samples, prompting the Navy to request TTEC to review the work and complete additional cleanup. By 2016, additional concerns surfaced regarding TTEC's cleanup work. The Navy, EPA and the state investigated the quality of TTEC's data. EPA and the state jointly reviewed multiple Navy reports of TTEC's radiological data. The Navy, EPA, and the state concluded there were widespread patterns of potential fabrication, data manipulation and/or data quality concerns. As a result, all TTEC data was determined to be unreliable.

Data reliability concerns from TTEC's work do not impact Parcel A, as described below under "Background on Parcel A" section.

### The Navy is completing radiological retesting at the Superfund site

In 2018, the Navy began developing work plans for radiological retesting. The Navy will retest all soil areas or remaining buildings where TTEC had done radiological investigation. EPA and the state continue to provide regulatory oversight of these work plans and related fieldwork. If these retesting efforts find site-related radiological contamination, the Navy will complete additional cleanup actions. (For additional information on the radiological retesting, please refer to the Navy's website noted in the "For More Information" section below.)

In September 2020, the Navy began the radiological retesting fieldwork for wells. During ongoing retesting work, the Navy is monitoring the air and managing dust safety. These activities will protect workers, onsite tenants who currently work on the former naval shipyard and the nearby Bayview Hunters Point community. EPA and our state regulatory agency partners oversee this work and will be present during the Navy's fieldwork activities. For more information, see the Navy's October 2018 Fact Sheet "Parcel G: Radiological Retesting."



Part of the fieldwork to retest the soils in the trench sites, includes breaking up the asphalt (a), excavating (digging up) the soil (b), laying the soil on radiological screening yard (RSY) pads (c), and scanning and sampling the soil from the RSY pads.

**No one is being exposed to  
contamination while the Navy  
completes its cleanup**

*Under current conditions and use, the nearby community is not being exposed to site-related contamination. Most of the Superfund site is covered with asphalt or imported soil. At the landfill area, the Navy constructed an engineered cap to protect people from any possible contamination left beneath the ground. The Navy also contains, collects, and monitors gases from the landfill that result from decomposing materials.*

*In some areas of the Superfund site, the Navy is cleaning up chemicals and radionuclides left from its shipyard and laboratory. During this work, the Navy monitors the air and manages dust to ensure the safety of the workers and surrounding community. After the Navy completes cleanup work in different land parcels, it will transfer the parcel to the Office of Community Investment and Infrastructure.*



## The state concluded there are no radiological health and safety risks at Parcel A

In response to public concerns and the requests of the City and County of San Francisco and Speaker Nancy Pelosi, the California Department of Public Health (CDPH) conducted a radiological health and safety surface scan of Parcel A. CDPH explains the goal of the work as to ensure residents are not exposed to unsafe levels of radiation. CDPH finished this project in Summer 2019 and concluded there are no radiological health concerns throughout Parcel A.

While CDPH did find Potassium-40, this is a naturally occurring radionuclide normally found in the environment (in plants and animals). CDPH concluded the levels of Potassium-40 found at Parcel A do not pose a health or safety risk. CDPH found one radiological object: a deck marker (for more information, see the "Deck marker found on Parcel A" text box).

Radiological surface scanning is a thorough and effective way to measure radiological activity over large areas. In 2018, CDPH performed scanning in all accessible, outdoor areas in Parcel A. CDPH's scanning activities included the use of handheld instruments and instruments that were towed on a trailer behind a small vehicle ("towed array"). The areas scanned include the soil stockpiles and the undeveloped portion of Parcel A. In addition, CDPH scanned the old Navy kiln blocks found throughout Parcel A. In 2019, CDPH also collected radiological dust wipe samples in over 70 residential homes and art studios in Parcel A.

For more information on CDPH's radiological health and safety surface scan and dust wipe samples, please refer to CDPH's website noted in the "For More Information" section below.

### Deck marker found on Parcel A

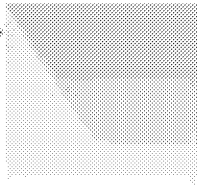
On September 11, 2018, the California Department of Public Health (CDPH) found a radium-containing naval deck marker during its radiological surface scan efforts. A deck marker is roughly the size of a silver dollar. They were typically used by the Navy to light passageways aboard ships. Radium was used inside deck markers so they would illuminate (or glow) at night.

The deck marker was found at the bottom of a hillside, in an undeveloped area near the intersection of Calver Avenue and Donahue Street at the boundary of Parcel A. It was buried under approximately 10 inches of soil. Radiation readings made before the deck marker was removed showed low radiation levels at the surface directly on top of the deck marker. Under EPA oversight, the Navy unearthed and removed the deck marker. Radiation readings after removal of the deck marker showed no remaining contamination in the soil. CDPH's surface scan found no other radiological objects at Parcel A.



\*\*\*\*\*

For more information on...



#### The Hunters Point Naval Shipyard Superfund site

- Visit the Navy's website: [www.hq.navy.mil/hsps](http://www.hq.navy.mil/hsps)
- Join the Navy's email distribution list by sending an email to [info@hspn.com](mailto:info@hspn.com)
- Call the Navy's site information line at (415) 295 - 4742
- Contact the Navy's Base Realignment and Closure (BRAC) Environmental Coordinator, Derek Robinson: (415) 524 - 6024 or [derek.j.robinson@navy.mil](mailto:derek.j.robinson@navy.mil)

---

#### EPA's oversight role of the Navy's cleanup work on the Superfund site

- Visit EPA's website: [www.epa.gov/superfund/hunterspoint](http://www.epa.gov/superfund/hunterspoint)
- Reach out to EPA's Community Involvement Coordinator (CIC), Yolanda Sanchez: (415) 972 - 3880 or [sanchez.yolanda@epa.gov](mailto:sanchez.yolanda@epa.gov)

---

#### California Department of Public Health's (CDPH) radiological health and safety scan on Parcel A\*

- Visit CDPH's website: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/IRIS/Environmental/HuntersPointNavalShipyardParcelA.aspx>
- Reach out to CDPH at [IRIS@hunterspointparcela.cdph.ca.gov](mailto:IRIS@hunterspointparcela.cdph.ca.gov)

---

#### The redevelopment on Parcel A or the larger area\*

- Visit the Office of Community Investment and Infrastructure (OCII) website: <http://ocii.org/hunters-point-shipyard-and-sandford-park>
- Reach out to OCII's Assistant Project Manager, Kethica McKinney: (415) 749 - 2422 or [kethica.mckinney@ocii.org](mailto:kethica.mckinney@ocii.org)

\*EPA cannot attest to the accuracy of non-EPA information provided by these third parties. EPA is providing these links for your reference. In doing so, EPA does not endorse any non-EPA websites, companies or applications.

---